

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
HARRISONBURG DIVISION

UNITED STATES OF AMERICA	)	
	)	Case No. 5:19-cr-00008
	)	
v.	)	
	)	
	)	
ALBERTO JIJON	)	
	)	

**UNITED STATES' PROFFER OF FACTS IN SUPPORT OF GUILTY PLEA**

This proffer of facts summarizes the facts and circumstances surrounding the criminal conduct of the defendant ALBERTO JIJON (herein, JIJON), that is at issue in this case. Had this case proceeded to trial, the United States would have proven these facts beyond a reasonable doubt. This proffer of facts does not necessarily contain all of the information obtained during this investigation and applicable to an accurate Presentence Report and Sentencing Guidelines calculation.

Beginning by at least November 2017 and continuing through at least December 2017, JIJON knowingly and intentionally conspired with others, including Guadalupe Ibarra-Ayon, also known as "Lupe," and others known and unknown, to distribute and to possess with the intent to distribute cocaine hydrochloride, a Schedule II controlled substance. JIJON purchased and obtained cocaine hydrochloride from Ibarra-Ayon and other individuals for the purpose of distributing it to others for profit.

Specifically, on or about November 20, 2017, as reflected in intercepted wire

communications, JIJON arranged for the delivery of a kilogram of cocaine hydrochloride from Ibarra-Ayon. Ibarra-Ayon travelled from Axton, Virginia to Winchester, Virginia to make the delivery along with the delivery of cocaine to other individuals. Both Axton, Virginia, and Winchester, Virginia are in the Western District of Virginia. On or about November 20, 2017, JIJON and Ibarra-Ayon met in Winchester, Virginia to complete the purchase as planned.

On or about November 24, 2017, as reflected in intercepted wire communications, JIJON arranged for the delivery of a kilogram of cocaine hydrochloride from Ibarra-Ayon. Ibarra-Ayon travelled from Axton, Virginia to Winchester, Virginia to make the delivery of cocaine. On or about November 24, 2017, JIJON and Ibarra-Ayon met in Winchester, Virginia to complete the purchase as planned. JIJON only paid Ibarra-Ayon for  $\frac{3}{4}$  of the kilogram of cocaine and made arrangements to pay the rest later.

On or about November 30, 2017, as reflected in intercepted wire communications, JIJON arranged for the delivery of a kilogram of cocaine hydrochloride from Ibarra-Ayon. Ibarra-Ayon travelled from Axton, Virginia to Winchester, Virginia to make the delivery along with the delivery of cocaine to others. On or about November 30, 2017, JIJON and Ibarra-Ayon met in Winchester, Virginia to complete the purchase as planned.

Between on or about December 13 and December 19, 2017, as reflected in intercepted wire communications, JIJON arranged for the delivery of a kilogram of cocaine hydrochloride from Ibarra-Ayon. On December 19, 2017, JIJON travelled to Ibarra-Ayon's residence in Winchester, Virginia to pick-up the cocaine and provide payment.

With respect to JIJON, the amount involved in the conspiracy attributable to him as a result

of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, was more than 500 grams of cocaine hydrochloride.

The actions taken by JIJON as described above were taken willfully, knowingly, and with the specific intent to violate the law. JIJON did not take those actions by accident, mistake, or with the belief that they did not violate the law.

Respectfully submitted,

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**C E R T I F I C A T E**

I hereby certify that a true and correct copy of the foregoing has been electronically filed with the Clerk by CM/ECF system, which will send notification of such filing to all counsel of record, on this 4<sup>th</sup> day of May, 2020.

s/Sean M. Welsh